

**United States v. Shacar  
21-cr-30028-MGM  
EXHIBIT “E”**



**U.S. Department of Justice**

**Rachael S. Rollins**  
United States Attorney  
District of Massachusetts

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United States Courthouse  
300 State Street, Suite 230  
Springfield, Massachusetts 01105-2926

October 31, 2022

By Email

Elaine Pourinski  
13 Old South Street  
Northampton, MA 01060

Re: United States of America v. Benjamin Shacar  
Criminal No. 21-30028

Dear Attorney Pourinski:

I am responding to your question regarding whether the Government intends to disclose additional materials in this matter. I have reviewed the past productions provided on June 3, 2021, March 3, 2022, and April 7, 2022 and the Government's response, dated April 4, 2022, to your letter dated March 21, 2022. Based on this, I believe the government has provided the materials required by Fed. R. Crim. P. 16 and Rules 116.1(c) and 116.2 of the Local Rules of the United States District Court for the District of Massachusetts.

I am unaware of additional outstanding discovery materials. If you believe there are certain items that the Government is required to provide which you have not received *and* which the Government has not previously declined to provide, please advise me of such.

Sincerely,

*/s/ Neil L. Desroches*  
NEIL L. DESROCHES  
Assistant United States Attorney

**Certificate of Service**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

By: /s/ Neil L. Desroches  
NEIL L. DESROCHES  
Assistant United States Attorney